



## Soundness Self-Assessment Checklist (March 2014) Completed by Braintree 2017

*This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.*

**In summary – the key requirements of plan preparation are:**

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

### **The Tests of Soundness at Examination**

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’ “, namely that it is:

#### **1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements**

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

#### **2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence**

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

### **3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities**

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

### **4. Consistent with national policy: enabling the delivery of sustainable development**

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal.gov.uk](http://www.planningportal.gov.uk)). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see [www.pas.gov.uk](http://www.pas.gov.uk)) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

**Soundness Test and Key Requirements****Possible Evidence****Evidence Provided**

***Positively Prepared:*** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 1 contains the wider vision and objectives for the Local Plan. A Local vision and 12 key objectives are set out in Section 2 Chapter 4 Vision and objectives. A spatial portrait is described in Chapter 3 District profile. Each policy has key outcomes or 'targets' listed in Chapter 9 Delivery and Implementation.</li> <li>• Chapter 5 outlines the spatial strategy and formulates a spatial hierarchy which accords with the objectives. The spatial strategy set out at Section 2 Local Plan paragraph 5.3 forms a guiding principle for the broad spatial location for housing, employment and retail policies.</li> <li>• Section 1 objectives for the region and 'wider strategic objectives' are set out in paragraph 1.31 and include; <ul style="list-style-type: none"> <li>• Providing sufficient new homes</li> <li>• Fostering economic development</li> <li>• Providing new and improved transport and communication infrastructure</li> <li>• Addressing education and healthcare needs</li> <li>• Ensuring high quality outcomes.</li> </ul> </li> <li>• These are expanded in 12 key objectives at paragraph 4.1: <ul style="list-style-type: none"> <li>- Creating a successful economy</li> <li>- Retail and Town Centres</li> <li>- Housing Need</li> <li>- Transport Infrastructure</li> <li>- Broadband</li> </ul> </li> </ul>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>- Education and Skills</li> <li>- Protection of the environment</li> <li>- Good quality design</li> <li>- Healthy communities</li> <li>- Social Infrastructure</li> <li>- Sustainability</li> <li>- Empowering local people</li> </ul> <ul style="list-style-type: none"> <li>• The policies in Section 2 were then structured around the three strands of sustainable development which relate to these key objectives: a prosperous district, better places and the natural environment. All key objectives are covered by one or more policies.</li> <li>• Reasonable alternatives to both the amount of development and overall strategy of the Plan have been considered at various stages of plan preparation. The Greater Essex Demographic Forecasts 2013-2037 Phase 7 Main Report has 9 different housing targets. At issues and options Local Plan, a range of growth between 750 – 950 homes was considered as well as five broad options for distribution. At Draft Local Plan stage, a spatial strategy, allocations and their alternatives were consulted on. An assessment of alternate spatial strategies features in chapter 5 of the SA.</li> <li>• Policies have been cross checked internally to ensure that they are consistent</li> <li>• SHLAA sites received have been explored by officers and by the Local Plan Sub Committee. Alternative options for employment, housing and retail were assessed in Appendix 4 of the SA (as summarised in chapter 10).</li> </ul>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>• DPD objections are calibrated to the timetable set out in the vision – by 2033.</li> <li>• The policies in Part 1 are consistent with part 2 Policies. LPP 1 to 82 are the means to achieving the DPD objectives.</li> </ul>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> <li>– any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>– specific policies in this Framework indicate development should be restricted.</li> </ul>	<ul style="list-style-type: none"> <li>• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>Section 1 Local Plan enshrines the flexible approach to development through SP1 Presumption in Favour of Sustainable Development which is based on the model policy. Development needs are identified for housing, employment through SP3 Meeting Housing Needs and SP4 Providing for Employment and Retail. Both needs assessments included uplifts for flexibility, economic growth and frictional land provision (see OAN study, 2015 and ELNA, 2015). In addition, the 5 year housing land supply target addresses shortfall from 2013/14 and applies a 5% buffer.</p> <p>A supporting evidence base underpins the allocations and policies in the Local Plan and can be found on the examination page. This includes a document which sets out how the spatial strategy has been formulated. This is also assessed in the sustainability appraisal.</p> <p>The Local Plan is prepared on the basis of cross border strategic planning through section 1 to address social, economic and environmental issues and meet OAN for housing and employment needs. Gypsies and Traveller needs have been assessed on a Greater Essex level and individually addressed in each authority’s local plans (see PPTS assessment below). Regard is paid to Local Plans for waste, minerals and transport in both sections.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Sustainability Appraisal describes the findings on how the policies and their alternative options in the Local Plan meet sustainability appraisal criteria individually and cumulatively (chapters 6,7,8 and 11).
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.	<ul style="list-style-type: none"> <li>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	Section 1 Local Plan enshrines the flexible approach to development through SP1 Presumption in favour of sustainable development which is based on the model policy.
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>• Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	<p>The Local Plan has met the FOAN for economic, social and environmental needs and complied with the duty-to-cooperate to address cross boundary strategic issues. Chelmsford, Colchester and Braintree share the same OAHN methodology while Tending are part of the same study, but have a variation of methodology that addresses unusual UPC concerns.</p> <p><b>HMA</b> (Braintree, Chelmsford, Colchester &amp; Tending. Objectively Assessed Housing Need Study, July 2015): The core evidence produced by Peter Brett Associates covers a housing market area (HMA) using the national HMA geography research from NHPAU and Newcastle University. Further analysis of migration containment, including alternative HMAs, commuting and house price data. The HMA excludes Maldon who are at a different stage of plan preparation (adopted local plan) and were considered within this examination as a standalone housing market area. A sensitivity test indicated that there would be a fractional difference therefore the HMA is a sound basis for assessing</p>

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		<p>housing need. A HMA comprising of Colchester, Chelmsford, Braintree and Tending was considered a sound basis on which to assess housing need.</p> <p><b>Starting Point</b> (iBid, July 2015; Greater Essex Demographic Forecasts 2013-2037 Phase 7 Main Report, April 2015 ): EPOA jointly commissioned robust and consistent demographic information across several Essex authorities. The starting point for the OAHN for the HMA authorities was then considered against 9 alternative demographic projections scenarios in Chapter 4 of the PBA report. The effect of UPC was considered in the EPOA demographic modelling. The 2012-based official (DCLG) projection for the HMA is 2,916 per annum dwellings, of which Braintree’s share is 686 dpa.</p> <p><b>Past provision and Market Signals</b> (iBid, July 2015; AMR 2016 Strategic Housing Market Assessment Update, December 2015) For Braintree District, historic housing delivery, Affordability and house prices are considered at paragraphs 7.31 to 7.26. Housing completions are compiled from the Authority Monitoring Reports. Net completions have consistently exceeded Local Plan targets between 1996/7 until 2007/08.</p> <p>More detailed affordability information is provided in the SHMA by HDH Planning &amp; Development paragraphs 3.29 to 3.39 where general affordability is considered by comparing lower quartile house prices with lower quartile income. Braintree’s affordable ratio is comparable with surrounding authorities, in addition the rental sector is relatively affordable and therefore is no adjustment is considered necessary.</p>



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		<p><b>Employment</b> (EEFM 2016 baseline forecasts, Cambridge Econometrics 2016; Greater Essex Demographic Forecasts 2013-2037 Phase 7 Main Report, April 2015; The EEFM jobs forecast is a well-respected, standardised economic model that has been produced for a sustained period at the regional area level. The Employment Land Needs Assessment makes an assessment of the need for employment land and the findings of which have been included within the Local Plan, resulting in a number of allocations for employment land adjacent to the main towns and as part of the largest strategic growth locations. This includes a longer term commitment to employment growth in the garden community as it progresses beyond the Local Plan period.</p> <p><b>Affordable Housing Need</b> (iBid, July 2015, Strategic Housing Market Assessment Update, December 2015) Affordable housing in the context of establishing the OAN is considered in the OAHN study in chapter 8, paragraphs 8.1 to 8.10. The analysis of the NPPF/PPG and High Court judgements states that affordable is not a component to be added into the OAN, instead a 6 step process (paragraph 8.10) should be followed to compare the estimated amount of affordable with the affordable need.</p> <p>Using the 6 step approach above, the supply is calculated from strategic growth locations, allocations above 10 dwellings and allocations on garden communities, where each site expected to deliver 30-40% affordable housing subject to viability. In addition provision of rural exception units and specialist housing will contribute to tackling affordable need as will a proportion of windfall sites (depending on the size of the site).</p>

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		<p>Affordable housing need for Braintree is set out in appendix 5 of the SHMA. Total need annual for affordable housing is summarised in table 5.10a as 351 but this can be refined to 212 per year.</p> <p>212 is approximately 25% of the OAHN and could be met from strategic sites and garden communities alone, this means that a reasonable proportion of affordable need can be met.</p> <p><b>London Uplift</b> (iBid, July 2015) The OAHN study at paragraphs 9.6 to 9.13 has considered if an adjustment for London overspill is necessary. The HMA's share of GLA's unmet need is estimated to be 64 dpa which would be absorbed within the 'future jobs' scenario and therefore a further uplift is not required. Ongoing duty-to-cooperate meetings have not raised any issues for this Local Plan from London authorities or the GLA.</p> <p><b>Crossboundary Strategic Issues</b> Communication with neighbouring and other LPAs within the HMA has been ongoing up to the point of submission and an MOU has been signed with the local authorities in north Essex to meet those needs and collaborate strategically.</p> <p><b>Overall OAN</b></p> <p>The first OAN report was produced in 2015 and was updated in 2016 to reflect the most up to date information available. It has been produced by well-respected consultants and has been the subject of a number of planning application appeals where the methodology across the housing market area has been supported. The OAN figure for new homes is therefore</p>

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		considered robust.
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> <li>Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>The SELEP Plan (2014) identifies Braintree District within two of twelve growth corridors: the A120 Haven Gateway and A12 Brentwood to Colchester. The LEP strategy focuses on the skills gap and productivity, apprenticeships and housing affordability.</p> <p>The Braintree District Economic Prospectus sets out the strategy for economic growth. By seeking to utilise Braintree’s competitive advantage of being well located in respect to global growth hubs, quality environment but competitively priced employment land, three priorities are formulated for the District. These are infrastructure, business and employment support and town centre and rural regeneration. This is currently being updated and the objectives in the new ‘Plan for Growth’ are reflected in the Local Plan.</p> <p>Building on the two economic strategies above, the Local Plan’s spatial strategy of concentrating growth at the main towns, garden communities and along the A120/A12 complements the SELEP’s economic vision. The spatial strategy will deliver greater infrastructure benefits and town centre regeneration, employment land allocations will support new and growing businesses. Rural regeneration is supported through redevelopment of brownfield land and deallocation of underperforming employment land.</p>

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		<p>An Employment Land Needs Assessment (2015) was commissioned to recommend strategies based on local economic factors and drivers of change. Business support, skills and productivity are also supported by rationalising and agglomerating employment land onto locations with good access to urban centres, the A120 and A12. This aligns employment with housing and the spatial strategy.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>	<p>The Braintree District Economic Prospectus 2013/26 identifies capacity on the A120 and A12, the Fitch branch line, rural broadband, supporting inward investment and skills as barriers to growth. Policies LPP2, LPP18, LPP10, LPP58 seek to respond flexibly as these barriers are addressed through future investment programmes.</p> <p>Braintree’s Employment Land Needs Assessment (2015) has recommended the deallocations of underperforming Employment Land Areas which are implemented through the Local Plan. For the majority of issues the recommendations in the ELNA were accepted and forecasts for additional employment land for a ‘medium’ growth scenario was used to allocate new land. The long term protection of employment land is proactively avoided and derelict former employment land is not identified as a problem in the District.</p>
<p><b>2. Ensuring the vitality of town centres (paras 23-37)</b></p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> <li>• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre</li> </ul>	<p>Braintree District Retail Study (November 2015) calculates the future retail need of the District using a methodology based on the NPPF and PPG.</p> <p>It sets out a retail hierarchy in chapter 5 and draws on retail</p>

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	<p>sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</p>	<p>ranking evidence by Venuescore at paras 2.0 to 2.16 to confirm a well-established hierarchy carried over from the core strategy.</p> <p>Town centre boundaries and primary shopping areas are considered in chapter 5 and no alterations were recommended, beyond that proposed and implemented in the 2012 retail study update. The study identified that the majority of future growth would be at Braintree/Freeport, with limited growth at Halstead and Witham.</p> <p><b>LPP10 Retailing and Regeneration</b> identifies three town, one district and six local centres, plus five new ones as part of Strategic Growth Locations. A sequential test policy using smaller than NPPF thresholds is established in Policy <b>LPP10 Retailing and Regeneration</b> to protect vulnerable town centres.</p> <p>All three towns have regeneration areas identified to accommodate retail growth. Out-of-town/edge-of-centre retail is also being allocated on Land south of Millennium Way as per <b>LPP16 Retail Site Allocations</b> using <b>LPP15 Retail Warehouse Development</b> to guide it. There will be new Local Centres in the garden communities (which will meet the long term growth and sustainability requirements of these standalone settlements) and other strategic growth areas.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<ul style="list-style-type: none"> <li>• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>• Primary and secondary shopping frontages identified and allocated.</li> </ul>	<p>Quantitative need for comparison and convenience shopping is calculated within chapter 3 of the Braintree Retail Study 2015. The study concludes a need for 8,966 sqm A1 convenience, 15,869 A1 sqm comparison and 8,304 sqm A3/A4/A5 within the plan period. Needs for other town centre uses are covered in chapter 4 of the study.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Policies LPP13 and LPP10 allocates land for all forms of retail in the following areas:</p> <ul style="list-style-type: none"> <li>- Land at Manor Street, Braintree</li> <li>- Land at Sainsbury's, Braintree</li> <li>- Land at Tesco, Braintree</li> <li>- Land at Newlands Street, Witham</li> </ul> <p>Extant permission exists at the following locations for A1 retail warehousing:</p> <ul style="list-style-type: none"> <li>- Maltings Lane</li> <li>- Land south of Millennium Way (13/01479/FUL)</li> </ul> <p>New Local Centres are expected to support a limited amount of retail (1,500sqm per 2,000 houses, max 6,262sqm). New retail provision could also be included as part of mixed use developments at Comprehensive Redevelopment Areas at LPP24, LPP27, LPP28, LPP29, LPP30 and LPP31.</p> <p>Condition and refurbishment need of Community Halls were covered in the Community Halls Study which is produced in two halves, the first with the main towns and the second the rural areas.</p> <p>Primary and secondary retail frontages were considered in chapter 5 of the Retail Study (2015). Policy LPP11 Primary Shopping Areas retains allocations proposed in Site Allocations and Development Management Plan.</p>
<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new</p>	<ul style="list-style-type: none"> <li>• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural</li> </ul>	<p>Section 2 positively addresses development needs for businesses and tourism uses through targeted policies. Policies for sustainable residential development and</p>

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development. (28)	tourism and leisure developments, and support local services and facilities.	<p>infrastructure in rural areas support a vibrant rural economy.</p> <p>LPP39 Replacement Dwellings in the Countryside, LPP41 Infill Development in Hamlets, LPP18 allocations in rural areas.</p> <p>LPP9 Tourist Development in the Countryside – Permits tourism related accommodation and facilities subject to criteria.</p> <p>LPP40 Rural Workers Dwellings in the Countryside – Permits the development of new dwellings for workers in agricultural industry.</p> <p>LPP42 Residential Conversion of Buildings in the Countryside – permits conversion of agricultural buildings according to a criteria, including being in a sustainable location and having suitable access. (This policy would only deal with buildings not falling within permitted development rights)</p> <p>Policy LPP44 Sustainable Transport – seeks to improve public transport, walking and cycling links within and between settlements.</p> <p>LPP49 Broadband – requires all new residential and commercial developments to be served by fast and reliable broadband or a equivalent developer’s contribution subject to viability.</p> <p>To support the rural economy, limited volumes of growth at Key service villages and some Secondary Villages will sustain services at these locations into the plan period.</p>
<b>4. Promoting sustainable transport (paras 29-41)</b>		

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<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey</p>	<ul style="list-style-type: none"> <li>• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>• Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>Strategic priorities for sustainable transport are set out in SP5 Transport and Infrastructure which supports measures to encourage modal change but also supports improvements to strategic highways. These policies are transposed into Section 2 through a vision and spatial strategy which concentrates residential and employment development at towns and garden communities which are, or are capable of becoming the most accessible places in the District. Much of Braintree District is rural with fewer alternative options for transport and development is generally restrained in these areas.</p> <p>New developments at strategic growth locations and garden communities are expected to include a range of measures to improve sustainable transport links for bus, cycle and pedestrian users.</p> <p>LPP44 Sustainable Transport – overarching transport policy which seeks to improve public transport, walking and cycling links within and between settlements.</p> <p>LPP45 Parking Provision – requires provision of cycle and vehicle parking to accord with Essex Parking Standards. Protects existing parking at transport hubs (mainly rail stations).</p> <p>LPP48 New Road Infrastructure – Safeguarding for two major road schemes, two minor schemes and two proposals which support development. Refers to strategic road infrastructure improvements (A12/A120) in supporting text which is covered in more detail in section 1. These schemes for the A120 and A12 may further progress as the Local Plan examination takes place and there may be a need for further changes.</p>



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<p>lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>LPP55 Layout and design of development – 11. Promotes use of sustainable modes of transport. 13. No detrimental impact to public rights of way. 15. Permeable and well connected networks.</p> <p>LPP67 Natural Environments and Green Infrastructure – develop and enhance a network of multi-functional spaces.</p> <p>Evidence:</p> <p>Local Transport Plan, Essex County Council (2011)  Parking Standards Design and Good Practice, Essex County Council (2009)  Braintree Local Plan Preferred Option Assessment Highways/Transport Planning (2017)  Essex Growth and Infrastructure Framework (2017)  Open Space Study, BDC (2017)  Open Spaces Action Plan, BDC (2015)</p>
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>Provision of high quality Broadband is a key objective and wireless and physical Broadband connections are supported through policy <b>LPP49 Broadband</b> and is identified in the key objectives for the Plan.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> <li>• Identification of: <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>• A SHLAA</li> </ul>	<p>Evidence: Five Year Housing Land Supply Statement and Section 2, Appendix 1 Housing Trajectory.</p> <p>The 5 year supply position will be updated at the time of examination, but a trajectory showing the position as at June 2016 was included in the Local Plan. This has changed since the granting of a number of planning permissions some of which were not in the Local Plan and so do not currently feature in the trajectory.</p> <p>The Local Plan includes a windfall allowance of 75 homes per year which is robustly backed by historic trends and future trends such as the agricultural and office permitted development rights which have delivered significant numbers of homes in the District. This has been sense checked by specialist consultants.</p> <p>A SHLAA has been produced and is updated on a yearly basis. It is published on the website as part of the evidence base.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>Allocations for a total of 15,488 dwellings are identified in Section 2, Appendix 1 Housing Trajectory, this includes the broad areas of search for garden communities. The majority of Strategic Growth Locations are expected to begin by years 1-5 however much of their delivery will be throughout the plan period, years 5-10 and 10-15. Whilst delivery 3,650 dwellings are expected to be delivered at garden communities, delivery is not expected to begin until years 6-10 of the plan period and will continue for 30 or more years.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Evidence: Section 2, Appendix 1 Housing Trajectory.
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	<p>Section 2, Appendix 1 Housing Trajectory. Five Year Housing Land Supply Statement. Local Authority Monitoring Report (2016).</p> <p>A housing implementation strategy/updated 5 year supply position can be circulated nearer to the time of the examination to include more details on these issues. An up to date monitoring report will be published at the end of 2017 and will be added to the Local Plan evidence base.</p>
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	<p>LPP37 Housing Type and Density seeks to develop at densities appropriate to the area in accordance with a criteria. Paragraphs 6.115 to 6.116 describes that the Council generally expects 30dph minimum and indicates that higher densities could be appropriate near local centres or public transport hubs.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and housing for older people</li> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and</li> </ul>	<p>Housing Provision and Strategic Growth Location Policies LPP17 – LPP32 – every Strategic Growth Location policy states that new home be of a mix and type appropriate for the area.</p> <p>LPP33 Affordable housing / LPP34 Affordable housing in the Countryside – provision of affordable homes for supply the needs of housing sub-markets.</p> <p>LPP35 Specialist housing – a criteria based policy for managing the development of housing designed for the elderly, disabled, young or vulnerable adults.</p> <p>LPP36 Gypsy and Traveller and Travelling Showpersons'</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>balanced communities. (50)</p>	<p>Accommodation – identifies and meets the needs for residents requiring pitches in accordance with the PPTS.</p> <p>LPP 37 Housing Type and Density – core policy to guide development, referring to the provision of housing mix in accordance with the SHMA.</p> <p>Evidence:</p> <p>Strategic Housing Market Assessment Update (2016)</p> <p>Braintree District Council Housing Strategy 2016 -2021 (2016)</p> <p>Affordable housing viability study report</p> <p>Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment on behalf of Essex Planning Officers Association (2017)</p> <p>Braintree Economic Viability Report (2017)</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>LPP34 Affordable housing in the Countryside – Rural exception site policy for under 15 dwellings. Market housing element limited to 30% and scheme requires proof of local housing need.</p> <p>LPP38 Residential Alterations, Extensions and Outbuildings – Outbuildings are permitted provided they do not constitute overdevelopment, are subordinate to the original dwelling, are well related and do not adversely impact a range of criteria.</p> <p>LPP40 Rural workers dwellings in the Countryside – permits</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>construction of new dwellings if required for a rural activity subject to profitability of the business and restrictions on conditions.</p> <p>LPP41 Infill development in Hamlets – requires applicants to meet the policy criteria, for consideration as an infill development.</p> <p>LPP42 Residential conversion of building in the Countryside – allow change of agricultural and other buildings to residential dwelling subject to a criteria.</p> <p>Neighbourhood Plans are able to allocate housing above that identified in the Local Plan. There are currently 8 Neighbourhood Plans underway in the District, including one which is currently in examination.</p>
<p><b>7. Requiring good design (paras 56-68)</b></p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> <li>Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	<p>Section 2 includes a number of development management and design polices which generally regulate development especially:</p> <ul style="list-style-type: none"> <li>- LPP50 Built and historic environment, LPP60 Heritage assets and their settings – ensures developments respond to the historic environment.</li> <li>- LPP55 Layout and design of development – seeks high quality design addressing many of the principles in NPPF paras 58 to 61.</li> <li>- LPP56 Conservation Areas, LPP58 and LPP59 - development must be designed to enhance conservation areas.</li> </ul>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Design codes are not incorporated into the policy however design codes (to be agreed with the Council) are normally expected on strategic growth locations as part of the planning conditions.</p> <p>Evidence Base  - Essex Design Guide</p> <p>- Historic Towns in Essex Witham (1999)  Conservation Area Appraisals (CAA) for  - Village Design Statements (VDS) for Borley, Bulmer, Castle Headingham, Earls Colne, Gestingthorpe, Great Bardfield, Middleton, Panfield, Rayne, Rivenhall and Terling.</p>
<p><b>8. Promoting healthy communities (paras 69-77)</b></p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</li> </ul>	<p>LPP37 - Housing Type and Density - new dwellings to be delivered with a mix that accords with the SHMA 2015 (or successor).</p> <p>LPP51 An Inclusive Environment – requires development to achieve the highest standards of accessibility. Supporting text stipulates Part M building regulations and BS8300, and encourages inclusion of changing places toilets.</p> <p>LPP55 Layout and Design of Development - Point 8 promotes a safe and secure environment which encourages maximum natural surveillance.</p> <p>Evidence Base:  Community Halls Study Part 1  Community Halls Study Part 2</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</li> </ul>	<p>Infrastructure Delivery Plan (2017)</p> <p>LPP65 Local Community Services and Facilities – protects existing facilities for community use and restricts change-of-use. This policy formally allocates 2 existing community assets and 3 sites for new facilities (including Land at Hunnable Industrial Estate which already has planning permission).</p> <p>New community facilities are required as part of the policies for some Strategic Growth Areas (LPP18 – LPP24) and the Garden Communities. The IDP outlines the need, location and timescale for new community facilities in chapter 10. It also refers to opportunities for the co-location of some community and sports facilities.</p> <p>Evidence Base:  Community Halls Study Part 1  Community Halls Study Part 2  Infrastructure Delivery Plan (2017)</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<p>Policy LPP53 Provision for Open Space, Sport and Recreation – protects high quality open space, recreational use buildings or spaces of particular value. Spaces are divided into six categories and are shown on the policies map:</p> <ul style="list-style-type: none"> <li>- Small amenity areas,</li> <li>- Formal and informal recreation,</li> <li>- Community spaces,</li> <li>- Natural greenspaces,</li> <li>- Visually important spaces, and</li> <li>- Play Areas</li> </ul> <p>Policies for managing development on open spaces apply to all open spaces. For adverse development, surplus of open</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>space provision must be demonstrated. This policy also protects existing public rights of way, while LPP44 Sustainable Transport also protects existing rights of way and promotes enhancements.</p> <p>The open space study explores the surplus/underprovision according to type and sets standards for the provision of new space at Table 19.</p> <p>Evidence Base:</p> <p>Braintree Open Space Study 2016-2033 (2017) Open Space action plan (2017)</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</li> </ul>	<p>LPP65 Local Community Services and Facilities protects two community orchards as a ‘community facility’ and the policies map allocates Visually Important Spaces, a Local Green Space is being proposed in Coggeshall. We are encouraging Neighbourhood Plan groups as appropriate to look at allocations of Local Green Space.</p>
<p><b>9. Protecting Green Belt land (paras 79-92)</b></p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>○ Specify that inappropriate development should</li> </ul> </li> </ul>	<p>N/A</p>



Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<p>not be approved except in very special circumstances. (87)</p> <ul style="list-style-type: none"> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul>	
<p><b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b></p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> <li>● Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>● Support for energy efficiency improvements to existing building.</li> <li>● Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95))</li> </ul>	<p>Sustainability is one of the key objectives of the local plan, this goal is for all development to encourage use of renewable energy and energy efficiency measures, and is translated into the following Section 2 policies below. By collocating homes, jobs, services and facilities, the council’s spatial strategy plans for new development in locations which reduce greenhouse gas emissions.</p> <p>Policy 74 Climate Change – requires the submission of a Sustainability Statement demonstrating how design accounts for the principles of climate change mitigation/adaptation.</p> <p>Policy 75 Energy Efficiency – encourages efficiency measures in all new development, suggests a range of measures including site layout, natural light/ventilation, air tightness and solar shading.</p> <p>LPP77 Renewable energy within new developments – on major developments, renewable should provide 20% of projected energy needs, and on minor developments this should be 10%.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</li> </ul>	<p>Sustainability is a key objective in the local plan.</p> <p>LPP77 Renewable energy within new developments – this policy seeks to increase local energy generation by requiring 20%-10% of projected energy needs to be installed from the outset.</p> <p>LPP76 Renewable energy schemes - guides applications for renewable energy projects, this policy applies to all schemes regardless of size but is aimed at mass generation.</p> <p>Evidence Base: Sustainable design and construction checklist Braintree Viability Study (2017)</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>All allocations have taken into account pluvial, fluvial and surface water Flood Risk as demonstrated in the Sustainability Appraisal. Flood risk was integral to the call-for-sites assessment methodology and a key criteria during site selection.</p> <p>LPP78 Flooding Risk and Surface Water Drainage – requires development to be located away from flood risk areas. Proposals in flood risk 2 and 3, taking into account the 2016 interim assessment of Climate Change allowances, must satisfy the sequential test and the exception test. This policy was informed by the Strategic Flood Risk Assessment.</p> <p>Policies for adaptation measures: LPP55 Layout and design of development – point 6 says that</p>

		<p>designs for development must incorporate water efficiency, climate change and flood resilience. The water cycle study indicates that there is scope for substantial savings through incorporating water efficiency measures in new buildings.</p> <p>LPP78 Flooding risk and surface water flooding – vulnerable developments must be adapted to allow for flood events, taking into account climate change.</p> <p>LPP79 Surface water management plan – establishes critical drainage areas (CDAs) and requires betterment on runoff rates and at source SUDS measures for smaller developments.</p> <p>LPP80 Sustainable Urban Drainage – manages surface water runoff with allowances for climate change in rainfall events.</p> <p>Evidence Base:  Braintree District Council Level 1 Strategic Flood Risk Assessment Update (2016)  Level 2 Strategic Flood Risk Assessment (2017)  Braintree and Witham Draft Surface Water Management Plan (2016)  Braintree Borough Council Water Cycle Study (2016)</p>
Take account of marine planning (105)	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the</li> </ul>	N/A

	MPS	
Manage risk from coastal change (106)	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	N/A
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</li> </ul>	<p>LPP67 Natural environment and green infrastructure – establishes the concept of green infrastructure and may require development to contribute to enhancements. Protected lanes as identified on the policies map and LPP46 also contribute to green infrastructure networks.</p> <p>LPP68 Protected species, priority species and priority habitat – outlines a hierarchy of protections for internationally, nationally and locally designated sites for nature conservation and seeks their protection, management and/or mitigation. Local Wildlife Sites, Local Nature Reserve and Special Sites of Scientific Interest are identified on the policies map.</p> <p>LPP70 Protection, enhancement, management and monitoring of biodiversity – Encourages contributions for enhancements to biodiversity through on-site schemes commensurate with the scale of development.</p> <p>LPP71 Landscape character and features – refers to the Landscape Character Assessment and requires applications to be informed by and sympathetic to such evidence. Also may require landscape enhancements and green infrastructure improvements. Protects Dedham Vale AONB and its setting.</p>

		<p>LPP72 Green Buffers – identifies and protects four green gaps from coalescence, adverse impact on setting, character and physical separation.</p> <p>Agricultural land policy refers back to the NPPF with the supporting text at paras 8.28 – 8.30. It notes that 65% of total land area is BMVL (grade 1, 2 or 3a) and that the Council will seek to develop poorer quality land.</p> <p>Evidence base:  Open Space Study  Open Space Action Plan  Essex Living Landscapes (2013)  Braintree District Settlement Fringes Evaluation of Landscape Analysis Study of Braintree and environs (2015)  Habitats Regulation Assessment (HRA) Report for North Essex Authorities Shared Strategic Part 1 for Local Plans (2017)  HRA Report for Section 2 of the Braintree Publication Draft Local Plan (2017)  Recreation Avoidance and Mitigation Strategy (RAMS) is being worked on across the whole of Essex.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> <li>• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	<p>All allocations have taken into account noise and air pollution as demonstrated in the Sustainability Appraisal. Pollution and land contamination was integral to the call-for-sites assessment methodology and a key criteria during site selection.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	<p>LPP67 Natural environment and green infrastructure – protects and enhances sites for geodiversity.</p> <p>LPPP70 – Protection, enhancement, management and monitoring of biodiversity</p>

<p><b>12. Conserving and enhancing the historic environment (paras 126-141)</b></p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>Section 2 includes a number of development management polices to guide developments that affect historic assets:</p> <ul style="list-style-type: none"> <li>- LPP46 Protected Lanes – conserves rural lanes as part of the traditional landscape.</li> <li>- LPP50 Built and historic environment, LPP60 Heritage assets and their settings – ensures developments respond to the historic environment.</li> <li>- LPP55 Layout and design of development – seeks high quality design addressing many of the principles in NPPF paras 58 to 61.</li> <li>- LPP56 Conservation Areas - development must be designed to enhance conservation areas.</li> <li>LPP58 Shop fronts, fascias and signs in conservation areas – Guidance for shop fronts to ensure that conservation areas are not harmed.</li> <li>LPP59 Illuminated signs in conservation areas – Guidance for illuminated shop signs in conservation areas.</li> </ul> <p>Evidence Base:</p> <ul style="list-style-type: none"> <li>- Historic Towns in Essex Witham (1999)</li> <li>- Conservation Area Appraisals (CAA) for Bulmer, Finchingfield, Newlands Street, Pebmarsh, Sible Headingham and Silver End.</li> <li>- Village Design Statements (VDS) for Borley, Bulmer, Castle Headingham, Earls Colne, Gestingthorpe, Great Bardfield, Middleton, Panfield, Rayne, Rivenhall and Terling.</li> </ul>

		- Authority Monitoring Report (for Heritage at Risk Register)
<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Section 1 of the local accounts for minerals within the Garden Communities area of search for the west of Braintree.</p> <p>An assessment of minerals was included within the call-for-sites methodology and reported to members.</p> <p>Inset map 70 of the Local Plan maps out areas safeguarded within by the Minerals Local Plan 2016.</p>
<p><b>Justified:</b> <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI.</p>	<p>An adopted SCI 2012 was updated in 2013 following a 6-week public consultation and reviewed in response to changes in Legislation and the NPPF. The SCI has been complied with when undertaking public engagement and consultation for regulations 18 and 19 of the Local Plan. The Consultation Statement contains details of the actions undertaken each stage.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p>	<ul style="list-style-type: none"> <li>• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</li> </ul>	<p>See Evidence Base List for a full list of documents which have been completed.</p> <p>Previous versions of the Local Plan and the consultation</p>

<p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>AND</p> <ul style="list-style-type: none"> <li>Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	<p>strategy sets out how the responses and evidence base have been taken into account in the decisions made.</p> <p>Previous versions of the SA illustrates how evidence supports the strategy and policies.</p> <p>Consultation Statement and audit trail of Local Plan Sub Committee reports and minutes.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>Sections of the SA Report showing the assessment of options and alternatives.</li> <li>Reports on how decisions on the inclusion of policy were made.</li> <li>Sections of the consultation document demonstrating</li> </ul>	<p>The approach taken, given the reasonable alternatives, is considered to be the most appropriate and has been arrived at through the plan making process.</p> <p>For each Local Plan policy, the SA assesses alternative policy options considered. Reasons for rejecting each site is included as appendix 9 of the SA and a full appraisal of alternative sites is in appendix 6. An audit trail of Local Plan Sub Committee reports and minutes support this consideration of the alternatives and show how the preferred sites /options were arrived at.</p> <p>The consultation statement briefly outlines the issues that were raised at each stage and the Council's response.</p>



	<p>how options were developed and appraised.</p> <ul style="list-style-type: none"> <li>Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	
<p><b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> <li>Be deliverable</li> <li>Demonstrate sound infrastructure delivery planning</li> <li>Have no regulatory or national planning barriers to its delivery</li> <li>Have delivery partners who are signed up to it</li> <li>Be coherent with the strategies of neighbouring authorities</li> <li>Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>Be flexible</li> <li>Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</li> <li>Are the policies internally consistent?</li> <li>Are there realistic timescales related to the objectives?</li> <li>Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</li> <li>Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a</li> </ul>	<p><b>Objectives</b></p> <p>Strategic vision and objectives for North Essex are clearly stated at paragraphs 1.30 to 1.31 of Section 1 Local Plan. These are supplemented into Section 2 local vision and objectives in Chapter 4. All of the key objectives are met by the policies in the Local Plan and it is not considered that there are policy gaps and policies are considered consistent with each other.</p> <p>The timescale to meet the objectives is the Local Plan period and is considered realistic.</p>

	matrix).	
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>The infrastructure implications of the policies are identified clearly along with the delivery mechanisms and timescales for implementation in the Infrastructure Delivery Plan and accompanying infrastructure schedule (Table 13.1 Infrastructure summary table in the IDP). The IDP was prepared in consultation with infrastructure delivery partners and indicates how delivery of infrastructure will be coordinated with development.</p> <p>The council is not progressing with a CIL at the moment.</p> <p>A monitoring framework is set out in Chapter 9 of the Local Plan with the Authority Monitoring Report (AMR) providing a route for tracking performance and reviewing policies. Policy LPP82 Infrastructure Delivery and Mitigation requires developer's contributions to mitigate the impact of development where infrastructure capacity is insufficient.</p> <p>A whole plan viability assessment has been completed taking into account all policies in the Local Plan, including affordable housing, for residential and non-residential developments. In addition, a focused Affordable Housing Viability Assessment was completed in 2015 which provides viability detail at slightly more refined housing sub-markets.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>• Policies which seek to pull together different policy objectives</li> <li>• Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>Other local plan documents and policies are duly reflected in Section 2 Local Plan:</p> <ul style="list-style-type: none"> <li>• Section 1 Local Plan</li> <li>• Essex Minerals Local Plan</li> <li>• Essex Waste Local Plan</li> <li>• Local Transport Plan</li> </ul>

		<p>The Duty to Cooperate statement records the discussions which have been undertaken regarding other cross boundary issues.</p> <p>A north Essex MOU has been signed and further statements of common ground are likely to signed during the course of the examination.</p> <p>A wide variety of infrastructure delivery partners, government agencies and special interest organisations have been contacted at each consultation stage. Responses are available in the consultation statement.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ul> </li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>• Sections of the DPD identifying the key indicators of</li> </ul>	<p>Chapter 9 of the Local Plan sets out the proposed monitoring framework, including targets and key indicators. Contingency and implementation column describes management measures to remediate any deficiencies. Many of these indicators will be monitored through the Authority Monitoring Report.</p> <p>A housing trajectory is estimated in the appendix of the Local Plan and will be updated during the course of the examination.</p> <p>The Sustainability Appraisal also has a set of proposed monitoring indicators in chapter 12 to ensure that the likely significant effects do not become significantly adverse.</p> <p>A Mechanism for the Consideration of Unmet Housing Need has been agreed Essex wide and a modification to the section 1 of the Local Plan to reflect this has been suggested. More detail of this is set out in the Duty to Co-operate statement.</p>

	<p>success of the strategy, and the remedial actions which will be taken if adjustment is required.</p>	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>• Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</li> <li>• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</li> </ul>	<p>The Duty to Co-operate statement is included within the submission documents.</p> <p>A large number of evidence base documents have been commissioned on a cross boundary basis. This includes those that support the garden communities, those relating to Housing Market Area and Housing Need but also those related to other areas such as Infrastructure Delivery Plans and Viability Assessments.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>• Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>• Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out indicators, targets and milestones</li> <li>• Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>• Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>• Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	<p>Chapter 9 of the Local Plan sets out the proposed monitoring framework, including targets and key indicators for Braintree specifically, with table 1 in the section 1 including strategic monitoring. These have been informed by stakeholder requests and the Sustainability appraisal proposed monitoring indicators in chapter 12.</p>

**Consistent with national policy:** the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.

- Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?
- Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?

- Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.
- Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.
- Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.
- Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement
- Reports or copies of correspondence as to how representations have been considered and dealt with.

The Local Plan has been assessed and is considered compliant with the NPPF and NPPG. Higher level water efficiency measures and renewable energy provisions are considered appropriate given the allocation as a high water stress area and a high growth area focussing on sustainable development.

## Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	The requirements identified in the Gypsy & Travelling Showpersons Accommodation Assessment (2014) and Braintree specific Gypsy and Traveller Accommodation Assessment (2017), are based on desk based research, stakeholder engagement, neighbouring planning authorities, surveys of travelling communities and those in bricks and mortar accommodation. A full list of those contacted can be found in Appendix D of the 2014 document. The 2017 update followed the same methodology.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	The requirements identified in the Gypsy & Travelling Showpersons Accommodation Assessment (2014) and Braintree specific Gypsy and Traveller Accommodation Assessment (2017), are based on desk based research, stakeholder engagement, neighbouring planning authorities, surveys of travelling communities and those in bricks and mortar accommodation. A full list of those contacted can be found in Appendix D of the 2014 document. The 2017 update followed the same methodology. The evidence base has concluded that for Braintree a review of evidence should be undertaken later in 2018 to establish if, following the PPTS (2015) changes, has led to a need to invest in formal

Policy Expectations	Possible Evidence	Evidence Provided
		transit sites or emergency stopping places.
<b>Policy B: Planning for traveller sites (paras 7-11)</b>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <li>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 13 in the updated guidance Planning Policy for Traveller Sites (August 2015).</li> </ul>	<p>LPP36 Gypsy and Traveller and Travelling Showpersons' Accommodation – adopts identified needs for Gypsies and Travellers and Travelling Showpersons (GTTS) as assessed by the Essex GTAA which was undertaken to accord with the definition in Planning Policy for Travellers Sites (2015).</p> <p>For the years 2017 to 2033, the identified pitch needs for GTTS are as follows:  Years 1-5: 0 GT  Years 6-10: 1 GT, x TS  Years 11-15. 1 GT, x TS</p> <p>When the need of those not meeting the new planning definition of Gypsy and Travellers, up to 24 additional pitches would need to be provided. meaning a total of 26 pitches is required up to 2033.</p> <p>No suitable sites were submitted for consideration through the Local Plan process. As such unmet need is required to be accommodated on the three largest mixed use strategic growth locations at Great Notley, Broad Road in Braintree and Feering in accordance with policies LPP18, 19 and 22.</p>



Policy Expectations	Possible Evidence	Evidence Provided
		<p>Strategic growth locations were allocated as sustainable sites for the settled community and sustainability for GTTS pitches are considered to be similar. These pitches can meet all of the policy requirements (criteria a-h) of paragraph 13 of the PPTS.</p> <p>The council has decided to allocate enough pitches to accommodate GTTS needs of those who meet new planning definition and those who do not. Up to 26 Gypsy and Traveller pitches and 6 Travelling Showpersons will be allocated, and could include sites on the Garden Communities or speculative planning applications.</p> <p>A criteria for guiding applications for GTTS pitches is inclusive of LPP36.</p>
<p><b>Policy C: Sites in rural areas and the countryside (para 12)</b></p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>LPP36 Gypsy and Traveller and Travelling Showpersons' Accommodation – includes policy criteria a. which states that proposals for new pitches must be well related to existing communities.</p>
<p><b>Policy D: Rural exception sites (para 13)</b></p>		

Policy Expectations	Possible Evidence	Evidence Provided
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.</p>	<ul style="list-style-type: none"> <li>If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	<p>N/A</p>
<p><b>Policy E: Traveller sites in Green Belt (paras 14-15)</b></p>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> <li>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	<p>N/A</p>
<p><b>Policy F: Mixed planning use traveller sites (paras 16-18)</b></p>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the</p>	<ul style="list-style-type: none"> <li>Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> </ul>	<p>LPP36 Gypsy and Traveller and Travelling Showpersons' Accommodation – this policy requires Travelling Showpersons sites to allow storage of equipment. Mixed residential and business uses are not specifically encouraged by policy however it could be allowed under the discretion of the Council</p>

Policy Expectations	Possible Evidence	Evidence Provided
occupants and neighbouring residents.	<ul style="list-style-type: none"> <li>N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	by means of planning application.
<b>Policy G: Major development projects (para 19)</b>		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> <li>Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</li> </ul>	N/A

## Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur  
Allerdale  
Arun

Babergh  
Barking and Dagenham  
Barrow-in-Furness

Basildon  
Bassetlaw  
Bexley

Blackpool  
Boston  
Bournemouth

Broadland  
Broads Authority  
Canterbury  
Carlisle  
Castle Point  
Chelmsford  
Cheshire West and Chester  
Chichester  
Chorley  
Christchurch  
City of London  
City of Brighton and Hove  
City of Bristol  
City of Kingston upon Hull  
City of Peterborough  
City of Plymouth  
City of Portsmouth  
City of Southampton  
City of Westminster  
Colchester  
Copeland  
Cornwall  
County Durham  
Dartford  
Doncaster  
Dover  
East Cambridgeshire  
East Devon  
East Lindsey  
East Riding of Yorkshire  
Eastbourne  
Eastleigh  
Exeter  
Exmoor National Park  
Fareham

Fenland  
Fylde  
Gateshead  
Gloucester  
Gosport  
Gravesham  
Great Yarmouth  
Greenwich  
Halton  
Hambleton  
Hammersmith and Fulham  
Hartlepool  
Hastings  
Havant  
Havering  
Horsham  
Hounslow  
Huntingdonshire  
Ipswich  
Isle of Wight  
Isles of Scilly  
Kensington and Chelsea  
King's Lynn and West Norfolk  
Lake District National Park  
Lambeth  
Lancaster  
Lewes  
Lewisham  
Liverpool  
Maidstone  
Maldon  
Medway  
Middlesbrough  
New Forest  
New Forest National Park

Newark and Sherwood  
Newcastle upon Tyne  
Newham  
North Devon  
North East Lincolnshire  
North Lincolnshire  
North Norfolk  
North Somerset  
North Tyneside  
North York Moors National  
Park  
Northumberland  
Norwich  
Poole  
Preston  
Purbeck  
Redcar and Cleveland  
Richmond upon Thames  
Rochford  
Rother  
Scarborough  
Sedgemoor  
Sefton  
Selby  
Shepway  
South Cambridgeshire  
South Downs National Park  
South Gloucestershire  
South Hams  
South Holland  
South Lakeland  
South Norfolk  
South Ribble  
South Somerset  
South Tyneside

Southend-on-Sea  
Southwark  
Stockton-on-Tees  
Stroud  
Suffolk Coastal  
Sunderland  
Swale  
Taunton Deane  
Teignbridge  
Tending  
Test Valley  
Thanet  
Thurrock  
Tonbridge and Malling  
Torbay  
Torrige  
Tower Hamlets  
Wandsworth  
Warrington  
Waveney  
Wealden  
West Devon  
West Dorset  
West Lancashire  
West Lindsey  
West Somerset  
Weymouth and Portland  
Winchester  
Wirral  
Worthing  
Wyre  
York